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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : HON. MARK FALK  
v. : MAG. NO. 06-3673  
JUAN ORTIZ, : CRIMINAL COMPLAINT  
a/k/a "King Goby"

I, Theresa Fanelli, being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about November 7 and 8 2005, in Passaic County, in the District of New Jersey, defendant, JUAN ORTIZ, a/k/a "King Goby,"

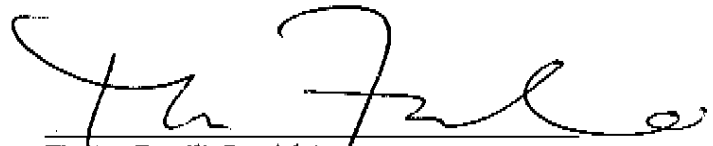
having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, knowingly possessed in and affecting commerce firearms and ammunition, namely, one Rexio Pucara .38-Special revolver, serial number C30018.

In violation of Title 18, United States Code, Section(s) 922(g)(1).

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT A

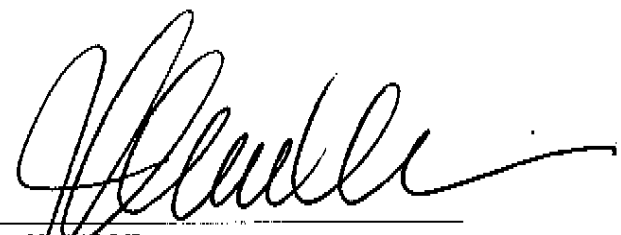
continued on the attached page and made a part hereof.

  
Theresa Fanelli, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in presence,

December 19, 2006, at Newark, New Jersey

HONORABLE MARK FALK  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

ATTACHMENT A

I, Theresa Fanelli, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon my investigation, review of reports and discussions with other law enforcement personnel and others:

1. On or about November 7, 2005, defendant JUAN ORTIZ met with a confidential cooperating witness (the "CS") at a location in Paterson, New Jersey. At that time, defendant ORTIZ showed the CS a Pucara .38-Special revolver, serial number C30018. ORTIZ then told the CS, in substance and in part, that he could obtain a .357 caliber firearm that he would be willing to sell to the CS-1. ORTIZ further stated, in substance and in part, that in the eleven months since he had last been incarcerated he had already obtained and lost seven guns. This meeting was consensually audio-recorded.

2. On or about November 8, 2005, JUAN ORTIZ sold the Pucara .38-Special revolver, serial number C30018 to the CS for approximately \$390 in United States currency. This transaction was consensually audio and video recorded.

3. The Rexio Pucara .38-Special revolver, serial number C30018, that the defendant JUAN ORTIZ sold to the CS on November 8, 2005, was manufactured in Argentina. It therefore traveled in interstate or foreign commerce, within the meaning of 18 U.S.C. § 921(a)(2).

4. A review of criminal history records conducted after the apprehension of defendant JUAN ORTIZ revealed that prior to November 7, 2005, defendant ORTIZ was convicted of felony offenses each punishable by terms of imprisonment greater than one year in a court in the State of New Jersey.

5. Specifically, on or about May 13, 2002, defendant JUAN ORTIZ was convicted in Passaic County Superior Court of Possession of a Controlled Dangerous Substance on School Property, in violation of N.J.S.A. 2C:35-7.